

## REMARKS

The courtesy of the Examiner in granting the undersigned attorney a personal interview on January 14, 2004 is gratefully acknowledged. During that interview, the disclosure of the Liebherr-Werk reference was discussed in light of proposed claim language. The Examiner indicated that such proposed language would overcome the 35 U.S.C. 102(b) rejection based on the Liebherr-Werk reference.

New independent Claim 43 defines the invention as a radiator arrangement for a vehicle including a support, a condenser supported on the support, and first, second, third, and fourth radiators supported on the support. The support, the condenser, and the first, second, third, and fourth radiators cooperate with one another to define a chamber. Lastly, a fan is supported on the support externally of the chamber and is adapted to cause air movement through all of the condenser and the radiators.

New independent Claim 46 defines the invention as a radiator arrangement for a vehicle including a support, a condenser supported on the support, first, second, and third radiators supported on the support, and an air permeable plate supported on the support. The air permeable plate has a resistance to the passage of air therethrough that corresponds to a resistance to the passage of air through a fourth radiator adapted to be supported on the support. The support, the condenser, the first, second, and third radiators, and the air permeable plate cooperate with one another to define a chamber. Lastly, a fan is supported on the support externally of the chamber and is adapted to cause air movement through all of the condenser, the radiators, and the air permeable plate.

New independent Claim 49 defines the invention as a method of assembling a radiator arrangement for a vehicle. Initially, a support, a condenser, first, second, and third radiators, an air permeable plate having a resistance to the passage of air therethrough that corresponds to a resistance to the passage of air through a fourth radiator, and a fan are provided. The support, the condenser, the first, second, and third radiators, and the air permeable plate are supported on the support to define a chamber. Lastly, the fan is supported on the support externally of the chamber to

cause air movement through all of the condenser, the radiators, and the air permeable plate.

The art of record does not show or suggest either of these claimed structures or the claimed method. Specifically, the Liebherr-Werk reference does not show or suggest either (1) a radiator arrangement wherein a support, a condenser, and first, second, third, and fourth radiators cooperate with one another to define a chamber or (2) a fan that is supported on the support externally of the chamber. Rather, the Liebherr-Werk reference discloses a chamber that is formed by only three radiators, an air impermeable bottom plate, an air impermeable back plate, and a fan. Thus, the Liebherr-Werk reference not only fails to show or suggest a chamber defined by the required number of radiators, but also fails to show or suggest a fan that is supported on the support externally of the chamber, as both specifically recited in independent Claim 43. Additionally, the Liebherr-Werk reference fails to show or suggest the use of an air permeable plate having a resistance to the passage of air therethrough that corresponds to a resistance to the passage of air through a fourth radiator, as specifically recited in independent Claims 46 and 49. Thus, it is believed that the claimed invention is clearly patentable over the Liebherr-Werk reference and the other art of record.